

January 15, 2026

Office of the Massachusetts Attorney General
Office of the Clerk of the Senate
Office of the Clerk of the House

Dear Attorney General Andrea Campbell, Senate Clerk Michael Hurley, and House Clerk Timothy Carroll:

Per Chapter 232 of the Acts of 2010 of the Massachusetts Session Laws (the "Act"), the Pension Reserves Investment Management Board ("PRIM") is required to annually report PRIM's divestment from Iranian restricted securities. PRIM Staff provides investment managers with quarterly lists of restricted securities. The managers are required to divest from said securities according to the timeline laid out in the Act, which mandates that 50% of PRIM's restrictive holdings be divested within 6 months of the security being added to the restriction list and 100% divested within 12 months of the security being added.

Per subsection (b) of Section 3 of the Act, PRIM reports that no securities of companies on the scrutinized companies list were acquired by PRIM in 2025. Per subsection (d) of Section 3 of the Act, PRIM reports that its investment managers with indirect holdings of restricted securities have not removed restricted companies from their funds (except as part of their trading strategy – not because of divestment concerns) nor have these managers created similar actively managed funds which exclude these restricted securities. Per subsection (1) of Section 6 of the Act, attached is the most recent scrutinized companies list, effective January 1, 2026.

If you have any questions regarding this letter or scrutinized companies list, please do not hesitate to contact Riya Shah, Investment Compliance Analyst, at (617)-946-8426 or via email at rshah@mapension.com.

Sincerely,



Anthony J. Falzone
Deputy Executive Director and Chief Operating Officer

Attachment

The Honorable Andrea Campbell
Attorney General
Office of the Massachusetts Attorney General
One Ashburton Place
Boston, MA 02108-1518

Michael Hurley
Senate Clerk
Office of the Clerk of the Senate
The Commonwealth of Massachusetts
24 Beacon Street
Room 335 — State House
Boston, MA 02133

Timothy Carroll
House Clerk
Office of the Clerk of the House
The Commonwealth of Massachusetts
24 Beacon Street
Room 145 — State House
Boston, MA 02133

ISSUER_NAME

CNPC (HK) Overseas Capital Ltd

CNPC Global Capital Limited

China National Petroleum Corporation

China Petrochemical Corporation

GAZ FINANCE PLC

GAZPROM CAPITAL OOO

GAZPROM PAO

Gaz Capital S.A.

Sinopec Group Overseas Development (2013) Limited

Sinopec Group Overseas Development (2015) Limited

Sinopec Group Overseas Development (2016) Limited

Sinopec Group Overseas Development (2017) Limited

Sinopec Group Overseas Development (2018) Limited